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From: drupal_admin@epa.gov [mailto:drupal_admin@epa.gov]

Sent: Tuesday, September 06, 2016 1:57 PM

To: HarborComments <HarborComments@epa.gov>

Subject: Harbor Comments

Submitted on 09/06/2016 4:56PM

Submitted values are:

Your Name: (b) (6)

Your Email: (b) (6)

Your Comments:

Hello,

I am writing to ask that the EPA Adopt Alternative G with enhancements to improve the long-term effectiveness of the cleanup for the Willamette River at the Portland Harbor superfund site.

The contamination of this superfund site, represents an environmental justice concern, hurting a community which is marginalized through poverty, race, and other social justice issues, therefore please assess this site with the extra provisions made for vulnerable communities, and create solutions considering that the community is likely to face many challenges and the toxicity of the river should be mitigated to the full extent on our behalf to protect us where other protective measures have failed.

Following the above concern, the affected community around the Portland Harbor needs regular opportunities for input during the construction phase of the cleanup. These should be conducted at times of day and night which accommodate work schedules, provide childcare, and be conducted in accessible locations and languages. As soon as data is gathered for the remedial design, please share this process with the community, so that it is involved from the beginning of the process.

Please have the US EPA lead the cleanup effort after the ROD, not the State of Oregon. As well, please require the state of Oregon to continue upland sources control, via legally enforceable means; the current text indicates that this approach "May" be taken. Please change the language so that the upland sources control "will" be legally enforceable.

I also ask that you include atmospheric transport in your analysis of exposures. This inclusion will indicate how much risk members of the community are exposed to by the remaining contamination.

In terms of disposal options, please do not use a Confined Disposal Facility, but do treat dredged sediment to separate or bind contaminants. I also request that sediment is removed from the Swan Island area rather a massive input of carbon being applied for treatment.

Please also reduce the need for "institutional controls", and include in the "records of decision" provisions for "potentially responsible parties" covering the costs of any institutional controls that are implemented, as well as provisions for evaluating the IC effectiveness with regular program modifications. Please require installation of environmental and quality of life monitoring during the construction phase, with the PRP's covering the cost, and please clearly state that this cost coverage will be legally enforced. Monitored natural recovery has not been shown to be effective and so I am asking you to conduct it only once per year as an evaluative tool, to assist other more effective measures. The remedy will have features that must be maintained in perpetuity so it would be helpful for all analytical tools to account for a longer time frame, in estimating costs and benefits.

Please insure that the goals and design of the fish tissue monitoring within the R.O.D. are clearly stated as requirements. As well, I ask that all aquatic habitat disturbed by any remedy is listed in the R.O.D. as expected to be restored with the full cost paid by the PRPs and that if nearshore and intertidal habitat must be removed, it will be replaced and replanted with thriving submerged aquatic vegetation.

In terms of the final remedy, I ask that it comply with state environmental quality, especially the water quality criteria for the principle threat waste contaminants. PCBs, dioxins and DDTs in water and fish must meet state water quality standards. As well, I ask that the final cleanup names a specific goal date for the lifting of the Fish Consumption Advisory in regards to PCBs within the Portland Harbor area.

Thank you so much for considering my concerns and the concerns of my community! I wish you great luck and fortitude in your process with helping us, the river, the harbor, the plants, and the animals to heal. I very much appreciate your effort and would welcome any reply that you may feel like sending in response to my comments.

(b) (6)